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HOPKINS COUNTY BROADCASTING COMPANY

RADIO STATION KSST

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SULPHUR SPRINGS, TX 75483

RECEIVED

JUL 13 1994

FCC MAIL ROOM

William Bradford, President.

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10 June 1994

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Secretary, Federal Communications Commission

1919 M. Street N. W.

Washington, D. C. 20554

This letter is in response to notice of inquiry in MM
Docket No. 94-34.

For credentials I would note this respondent has been
a broadcaster for over 50 years. I am owner and
operator of Hopkins County Broadcasting Company, Radio
Station KSST. I hold a commendation from the FCC,
NOAA and DCPA for EBS activities and other awards for
service including TAB Pioneer Broadcaster and Hopkins
County Citizen of the Year. KSST has won dozens of
programming and service awards from the industry and
organizations.

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Currently our staff is 25% Black, approximately three times the Black percentage in the Hopkins County Work Force, 1990 census. I am proud of our successful recruiting effort, but I am concerned that apparently we could face financial disaster through tens of thousands of dollars in forfeiture if we do not or have not maintained specific recruiting activities and documentation that may be totally unrelated to the results achieved. We would contend that it is evident that our program has been successful, and that special recruiting efforts and documentation becomes an unnecessary burden. We agree with the Texas Association of Broadcasters proposal that any station with staff ratios reflecting 50% or more parity on minority workforce percentages as reflected on the annual employment report be deemed to be in compliance absent a prima facie showing of discrimination. We would propose that specific mandatory recruiting practices and documentation be required of the individual Broadcaster only after the Station's annual 359B report, and/or other information indicated that the Broadcaster's initiative had become ineffective.

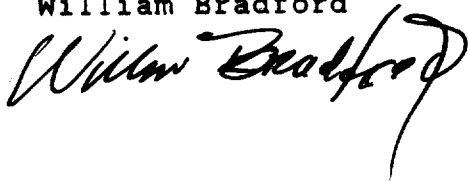
I understand that Broadcasters have been fined for not having minority applicants recruited for at least 66 percent of their hires, and/or some arbitrary numerical minimum during a license term. The prudent Broadcaster is thereby encouraged to recruit for documentation. We are concerned that the Broadcaster may not be acting in good faith to the applicant if the primary purpose of it's recruiting effort is to maintain required documentation.

In recent years a large number of small community broadcasters have "gone silent" because of competition for both listeners and advertiser dollars. The time and money spent on unjustified efforts and documentation could better be used in it's operations and community obligations.

We would recommend that the Commission encourage broadcasters to "pool" their recruiting efforts by recognizing the Broadcaster's participation in a program of sharing applications as appropriate documentation. State Broadcaster Associations would be an example of organizations which might be willing to efficiently and effectively recruit qualified minorities which would be available to participating stations.

In the matter of requiring broadcasters to encourage minority and women entrepreneurs to conduct business with all parts of their operation, we would note that, for the small broadcaster, salaries, taxes, utility bills, programming costs, and day to day parts and supply purchases make up the bulk of the small-town broadcaster's operating expenses. The time and expense of such compliance, in my opinion, could not justify any reasonably expected results.

William Bradford

A handwritten signature in cursive script, appearing to read "William Bradford", with a long, sweeping underline.